

**UNITED STATES DISTRICT COURT**  
**MIDDLE DISTRICT OF NORTH CAROLINA**  
**Civil Action No.: 1:19-cv-00593-LCB-JLW**

**ZION WILLIAMSON,**

**Plaintiff/Counter-  
Defendant**

**v.**

**PRIME SPORTS  
MARKETING, LLC and  
GINA FORD,**

**Defendants  
/Counter-  
Plaintiffs.**

**NOTICE OF MOTION**

**NOTICE OF MOTION FOR SUMMARY JUDGMENT**

**PLEASE TAKE NOTICE** that, upon the accompanying Local Rule 56. 1 Statement of Undisputed Material Facts, the Memorandum of Law, the Declaration of JoAnn Squillace, Esq. dated February 11, 2022 and the Exhibits attached thereto, the Affidavit of Gina Ford, and, all pleadings and proceedings heretofore had herein, Defendants/Counter-Plaintiffs PRIME SPORTS MARKETING, LLC and GINA FORD will move this Court before the Honorable Loretta Copeland Biggs on a date

to be determined by the Court at the United States District Court, Middle District of North Carolina, for an Order granting Defendants/Counter-Plaintiffs PRIME SPORTS MARKETING, LLC and GINA FORD, pursuant to Federal Rule of Civil Procedure 56, summary judgment as there are no genuine issue of material fact and same Defendants/Counter-Plaintiffs are entitled to judgment as a matter of law on, as and for Defendants'/Counter-Plaintiffs' PRIME SPORTS MARKETING, LLC'S and GINA FORD'S Counterclaims against Zion Williamson for: Fraud (Second Counterclaim ""CC")); Civil Conspiracy (Third CC); Unjust Enrichment (Fourth CC); Misappropriation/Violation of North Carolina Trade Secrets Protection Act, Article 24, Chapter 66 of North Carolina General Statutes, N.C. Gen. Stat §66-152, *et. seq.* (Fifth CC); Conversion (Sixth CC); Breach of Implied Duty of Good Faith and Fair Dealings (Seventh CC); Declaratory Judgment (Eighth CC); Injunctive Relief (Ninth CC); Violation of North Carolina's Unfair and Deceptive Trade Practices Act, NC Gen. Stat §75-1.1 (Tenth CC), and, Request for Punitive Damages (Eleventh CC). See DE 32.

Dated: February 11, 2022

Respectfully submitted,

/s/ JoAnn Squillace, Esq.

JoAnn Squillace\*

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*\*Local Rule 83.1(d) Special Appearance*

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